

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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November 15, 2019

By ECF

Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

*So ordered. The
conference is adjourned
to January 14, 2020,
at 2:00 pm.*

11-15-19

A. K. Hellerstein

Re: *United States v. David Wagner and Marc Lawrence*, Cr. 437 (AKH)

Dear Judge Hellerstein:

I represent David Wagner in the above-captioned case. I write on consent (Assistant U.S. Attorney Jilan Kamal and Mr. Lawrence's counsel, Michelle Fox) to respectfully request that the Court adjourn the conference currently scheduled for November 21, 2019, at 11:00 a.m., until a date in mid-January, 2020. Mr. Wagner has started a new job as a call-center representative and he will not be permitted to miss work during a two-week probationary period. The additional time will also allow me to continue to review the voluminous discovery in this complex case (several hundred thousand documents), and to discuss a potential disposition with the government.

Further, I request that the Court schedule the next Court appearance for a Tuesday, Wednesday, or Thursday at 2:00 or later, which will make it easier for Mr. Wagner to travel from Rhode Island and accommodate his work schedule.

If the Court grants the adjournment, I respectfully request (again on consent) that the Court exclude time under the Speedy Trial Act until the next conference date.

Respectfully submitted,

/s/
Martin Cohen
Assistant Federal Defender
(212) 417-8737

cc.: Jilan Kamal, Esq., by ECF
Sagar Ravi, Esq., by ECF
Andrew M. St. Laurent, Esq., by ECF
Michelle Fox, Esq., by ECF

